

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CURTIS LYONS,	)	
	)	<b>No. 07 C 6214</b>
Plaintiff,	)	
	)	
v.	)	JUDGE HIBBLER
	)	
OFFICERS CONNELLY, BECHIVA,	)	
JOHN DOE, AND THE	)	Magistrate Judge Valdez
CITY OF CHICAGO, A MUNICIPAL	)	
CORPORATION,	)	
Defendants.	)	

**DEFENDANTS' AGREED JOINT MOTION FOR ENLARGEMENT OF  
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, and Defendant Chicago Police Officers Connolly and Bechina, by their attorney, Thomas H. Freitag, Assistant Corporation Counsel, respectfully move for an extension of time to January 7, 2007 to answer or otherwise plead in response to Plaintiff's complaint. In support of this motion, the Defendants state the following:

1. Plaintiff filed his complaint on or about November 2, 2007. The City Clerk's Office was served with Plaintiff's complaint on or about November 9, 2007. Defendant Officer Connolly was served with the complaint on or about November 17, 2007. Defendant Bechina was served with the complaint on or about November 18, 2007.

2. We therefore have not had a chance to discuss the allegations contained in Plaintiff's Complaint with our clients in order to adequately answer or otherwise plead in this matter on their behalves. Answering on behalf of all Defendants at the same time will provide uniform briefing schedules as well as improved efficiencies for the Court.

3. We are therefore requesting a thirty (30) day enlargement of time from today, December 7th, 2007, to answer or otherwise plead for the Defendants, up to and including January 7th, 2007

4. This motion is the Defendants' first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the Defendants to respond properly to the allegations in Plaintiff's complaint.

5. I discussed this matter with the office of Plaintiff's counsel today by telephone, and they stated that Ms. Angela Lockett, under the circumstances, stated she had no objection to this motion.

6. Plaintiff has not been prejudiced by the delay in responding to his Complaint since the time service was had, and will not be prejudiced by the granting of this motion.

7. This motion is filed in good faith, and is not intended for the purpose of undue delay.

WHEREFORE, Defendants respectfully move this Honorable Court to enlarge their respective time thirty (30) days from today, up to and including January 7th, 2007, to answer or otherwise plead in this matter.

Respectfully submitted,  
MARA S. GEORGES  
Corporation Counsel  
City of Chicago

MICHAEL CONNOLLY,  
and STEVEN BECHINA  
By one of their attorneys,

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/s/ Thomas H. Freitag

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Thomas H. Freitag  
Assistant Corporation Counsel